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May 25, 2011

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I CERTIFIED BY THE SUPREME
COURT OF NEW JERSEY AS A
CIVIL TRIAL ATTORNEY
2 OF COUNSEL
+ ADMITTED TO NY
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ROGER GUARDA

CLAIMS MGR.

The Honorable Patty Shwartz, U.S.M.J.
US District Court, District of New Jersey
Lautenberg U.S. P.O. & Cthse. Building
Room 477
P.O. Box 999
Newark, New Jersey 07101

The Honorable Michael Shipp, U.S.M.J.
US District Court, District of New Jersey
Lautenberg U.S. P.O. & Cthse. Building
Room 477
P.O. Box 999
Newark, New Jersey 07101

RE: Pantoja, et al. v. City of Hoboken, et al.
Civil Action No.: 07-5113

GSMJIF, et al. v. Ace Illinois Insurance Company, et al.
Civil Action No.: 10-2036 (KSH)

Your Honors:

This firm represents the Plaintiffs in the Pantoja litigation. I write concerning status of settlement in the above-referenced matters.

I am told that the Settlement Agreement between the parties in the Pantoja matter has been approved by the governing body of the City of Hoboken. I am also told by counsel for Hoboken that an executed settlement agreement (executed by the City) is forthcoming. To date, however, I have not received an executed settlement agreement.

Plaintiffs respectfully request that all deadlines in this matter (the dismissal of the complaint) be stayed for a twenty day period, so Plaintiffs can ensure that the matter is not dismissed in the absence of a signed settlement agreement.

Thank you in advance for your attention to this matter.

Respectfully submitted,

GINARTE, O'DWYER, GONZALEZ, GALLARDO
& WINOGRAD, L.L.P.

By: 

ADAM J. KLEINFELDT, ESQ.

AJK/me

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